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   Attorneys for Plaintiffs
   BRUCE CAHILL, GREG CULLEN, SHANE SCOTT,
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   RON FRANCO, and PHARMA PAK, INC.,
10
                 IN THE UNITED STATES DISTRICT COURT
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               FOR THE CENTRAL DISTRICT OF CALIFORNIA
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13
                           SOUTHERN DIVISION
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   BRUCE CAHILL, an individual, et al., )
                                        CASE NO: 8:16-cv-00686-AG-DFM
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                Plaintiffs,
                                       RESPONSE TO APPLICATION
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                                       FOR LEAVE TO WITHDRAW
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                                       (DKT. #199) AND TO EX PARTE
                        -- VS. --
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                                       APPLICATION FOR ORDER
   PAUL PEJMAN EDALAT, an
                                       GRANTING DEFENDANT'S
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   individual, et al.,
                                       MOTION FOR LEAVE TO
20
                                       WITHDRAW AS COUNSEL (DKT.
                 Defendants.
                                       #200)
21
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                                       Honorable Andrew J. Guilford
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   AND RELATED CROSS-
                                       United States Courthouse
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    CLAIMS/COUNTERCLAIMS.
                                       411 West Fourth Street
                                       Santa Ana, CA 92701-4516
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RESPONSE TO APPLICATION FOR LEAVE TO WITHDRAW (DKT. #199) TO EX PARTE APPLICATION FOR ORDER GRANTING DEFENDANT'S MOTION FOR LEAVE TO WITHDRAW AS COUNSEL (DKT. #200)

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Plaintiffs and Counterclaim Defendants, through their undersigned counsel, hereby respond to the Application for Leave to Withdraw (Dkt. No. 199) and Ex Parte Application for Order Granting Defendant's Motion for Leave to Withdraw as Counsel, Or, In The Alternative, for An Order To Shorten Time and Advance The Hearing On Defendants' Motion For Leave To Withdraw As Counsel (Dkt. No. 200).

Plaintiffs/Counterclaim Defendants have no objection to the ex parte motion to the extent that it seeks either a hearing on shortened time or a resolution of the motion without a hearing, as the Court pleases. Plaintiffs/Counterclaim Defendants also do not object if leave is granted for current counsel of record for Defendants/ Counterclaimants to withdraw. However, this non-objection is conditioned upon replacement counsel appearing who are able to keep the current schedule which has a trial date in June, 2017. Both sides have worked hard to get the case ready and in light of the start-up companies that are involved, resolving the claims made against them earlier rather than later is very important to their financial well-being. Finally, plaintiffs have no objection to the Declaration of Kristopher Diulio, Esquire (counsel for Defendants/Counterclaimants) being filed under seal (as requested at Dkt. No. 198), if it contains nothing but confidential material that should be protected from disclosure under the ethics rules.

Respectfully submitted, Dated: March 21, 2017 MARKHAM & READ By: /s/ John J. E. Markham, II John J. E. Markham, II Attorney for Plaintiffs and Counterclaim Defendants

1 **CERTIFICATE OF SERVICE** 2 Commonwealth of Massachusetts) ss, 3 County of Suffolk. 4 I am employed in the county and state aforesaid. I am over the age of 18 and not a 5 party to the within action. My business address is One Commercial Wharf West, Boston, MA 02110 6 7 On March 21, 2017, I served the foregoing document described as: 8 RESPONSE TO APPLICATION FOR LEAVE TO WITHDRAW (DKT. 9 #199) AND TO EX PARTE APPLICATION FOR ORDER GRANTING 10 DEFENDANT'S MOTION FOR LEAVE TO WITHDRAW AS COUNSEL (DKT. #200) 11 12 [X] BY ELECTRONIC MAIL via the ECF filing system on: 13 Kristopher Price Diulio, Esq. 14 Brendan M. Ford, Esq. 15 FORD & DIULIO, PC 695 Town Center Drive, Ste 700 16 Costa Mesa, CA 92626 17 (714) 384-5542 kdiulio@forddiulio.com 18 bford@FordDiulio.com 19 20 Attorneys for Defendants Paul Pejman Edalat, Olivia Karpinski, Farah Barghi, Blue Torch Ventures, Inc., LIWA, N.A., Inc., Sentar Pharmaceuticals, Inc. and EFT 21 Global Holdings, Inc. 22 Executed on March 21, 2017, in Boston, Massachusetts. 23 24 I declare under penalty of perjury under the laws of United States and the State of 25 California that the foregoing is true and correct. 26 /s/ Elizabeth Read 27 Elizabeth Read 28 21